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Attorneys for Defendants and
Counterclaim Plaintiffs
Dr. Reddy's Laboratories, Ltd. and
Dr. Reddy's Laboratories, Inc.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ASTRAZENECA AB, AKTIEBOLAGET
HÄSSLE and ASTRAZENECA LP, KBI
INC. and KBI-E, INC.,

Plaintiffs and
Counterclaim Defendants,

V.

DR. REDDY'S LABORATORIES, LTD. and
DR. REDDY'S LABORATORIES, INC.

**Defendants and
Counterclaim Plaintiffs.**

07-CV-6790 (CM)(FM)

ELECTRONICALLY FILED

**DRL’S MOTION TO FILE UNDER SEAL DRL’S REPLY TO ASTRAZENECA’S
EXPLANATION OF INFRINGEMENT DISCOVERY AND DECLARATIONS IN
SUPPORT THEREOF**

Defendants Dr. Reddy's Laboratories, Ltd. and Dr. Reddy's Laboratories, Inc. (hereinafter "DRL") respectfully move this Court for an order sealing DRL's Reply To AstraZeneca's Explanation of Infringement Discovery ("DRL's Reply") and the following Declarations in Support Thereof:

(1) Declaration of Louis H. Weinstein, Esq. In Support Of Dr. Reddy's Laboratories, Ltd.'s and Dr. Reddy's Laboratories, Inc.'s Reply to AstraZeneca's Explanation of Infringement Discovery, and

(2) Declaration of Harry G. Brittain, Ph.D. In Support Of Dr. Reddy's Laboratories, Ltd.'s and Dr. Reddy's Laboratories, Inc.'s Reply to AstraZeneca's Explanation of Infringement Discovery

In support of its motion, DRL states that DRL's Reply contains DRL's confidential information relating to its omeprazole magnesium product and process for making same. AstraZeneca made a similar motion in its initial papers, which the Court granted on November 26, 2007.

Accordingly, DRL respectfully requests that the Court order that DRL's Reply be filed under seal and that the materials only be accessible by the Court and the parties.

A proposed order is submitted herewith.

Dated: November 28, 2007

By: s/Louis H. Weinstein

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Attorneys for Defendants and Counterclaim-
Plaintiffs

Dr. Reddy's Laboratories, Ltd. and
Dr. Reddy's Laboratories, Inc.

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CERTIFICATE OF SERVICE

I certify that on this 28th day of November, 2007, I caused a true and correct copy of the foregoing:

**DRL'S MOTION TO FILE UNDER SEAL DRL'S REPLY TO
ASTRAZENECA'S EXPLANATION OF INFRINGEMENT
DISCOVERY AND DECLARATIONS IN SUPPORT THEREOF**

be served upon counsel for AstraZeneca in the following manner:

By ECF, Federal Express and E-Mail

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s/Louis H. Weinstein

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